DEPARTMENT OF THE ARMY

U.S. Army Corps of Engineers

WASHINGTON, D.C. 20314-1000

REPLY To

ATTENTION OF: CEEO

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GUIDE TO AFFIRMATIVE EMPLOYMENT DATA ANALYSIS,

BARRIER ANALYSIS, AND ACTION PLANNING

INTRODUCTION

Executive Summary.

Affirmative employment programs have two purposes:

- To achieve representative diversity in the work force. Affirmative employment action is called for when the percentage of a protected group in a particular occupation in the work force is significantly less than that group's representation in that occupation in the relevant applicant pool, according to a statistical analysis.

- To correct imbalances in the impact of employment-related selections (for training, awards, promotions, etc.). Affirmative employment action is called for when selections of a protected group are significantly below the expected level, according to a statistical analysis.

An identified problem (underrepresentation or adverse impact) is a subject for action planning. Barriers (the policies, practices or procedures that caused or allowed the problem to develop) are identified and examined. Alternatives are considered and corrective actions are assigned to appropriate officials for implementation.

This process identifies and modifies unconstructive policies, practices and procedures; rectifies vulnerability to class claims of discrimination; ensures accountability for improvements; and enhances employee confidence in management's commitment to fairness and equity.

References.

EEOC MD-714, Instructions for the Development and Submission of Federal Affirmative

Employment Multi-Year Program Plans, Annual Accomplishment Reports, and Annual Plan

Updates for FY 1988 through FY 1992.

5 CFR Part 720, Federal Equal Opportunity Recruitment Program.

5 CFR Part 1607, Uniform Guidelines on Employee Selection Procedures.

29 CFR Part 1614, Federal Sector Equal Employment Opportunity.

AR 690-950, Career Management.

Memorandum, HQDA, DAPE-CPA, 22 Jul 87, subject: Federal Equal Employment Opportunity

Recruitment Program.

Additional References.

Hazelwood v. United States, 433 U.S. (1977) — The "standard deviation analysis" can demonstrate that a significant underrepresentation of minorities in a particular job category could be the result of a factor that was eliminating minority candidates. "... a fluctuation of two or three standard deviations would undercut the presumption that decisions were being made randomly with regard to race."

Partida v. Castaneda; 430 U.S. 482, 496-497 n. 17 (1977). Amplifies the discussion of "standard statistical deviations" and explains how they are calculated.

Johnson v. Transportation Agency, Santa Clara; #107S, CT. 1442, (1987). When applicants are similarly situated, affirmative action can be a criterion, but not the sole criterion.

Croson v. City of Richmond, 488 US 469, (1989). Affirmative action by state and local government is subject to strict scrutiny.

Adarand Constructors v. Pena; 63 U.S.L.W. 4523 (US 12 Jun 95). The "strict scrutiny" standard of review applies when a racial or ethnic classification is voluntarily applied as a basis of decision making; there must be a "compelling interesV' for race-based action and a "narrow tailoring" of corrective action.

Affirmative Employment Data Analysis. Affirmative employment data analysis is the process of gathering, organizing, and analyzing employment data. The analysis serves two purposes: to identify occupations or grade levels where minorities and women are underrepresented in comparison to the demographics of civilian workers in the same occupations in the same recruiting areas, and to identify adverse impact in hires, training, awards, promotions, and other employment selections.

Affirmative Employment Barrier Analysis. Affirmative employment barrier analysis is the process of identifying the underlying and contributing causes for underrepresentation and adverse impact.

Affirmative Employment Action Planning. Affirmative employment action planning is the process of developing alternatives to the barriers, assigning responsibilities for those actions, and setting target dates for completion of the actions.

Requirements for Affirmative Employment Data and Barrier Analyses. Requirements for these analyses are described in program regulations for:

Equal Opportunity Recruitment. In implementing the Federal Equal Opportunity Recruitment Program, EEO work force data and civilian labor force data are required to identify occupations and levels in which minorities and women are underrepresented in

the work force. Federal agencies are required to "conduct a continuing program for the recruitment of members of minorities. . . in a manner designed to eliminate underrepresentation of minorities in the various categories of civil service employment.. ." Hiring data are used to measure recruitment effectiveness. The barrier analysis section of the Affirmative Employment Program Plan (AEPP) for Minorities and Women may be used to meet Federal Equal Opportunity Recruitment Program requirements.

Employee Selections. The Uniform Guidelines on Employee Selection Procedures (UGESP) apply to employment selections for referral, hiring, promotion, demotion, demotion, membership (e.g., union), retention, and licensing/certification. They also apply to other categories of selections such as training, awards, performance ratings, and discipline when they lead to employment decisions. Under the UGESP, selection data are analyzed to identify adverse impact, which is presumed to be discriminatory. Selection procedures that have adverse impact must be changed or rigorously justified. Recruitment practices are exempt.

Class Claims of Discrimination. EEO data are required to support the adjudication of claims of discrimination filed by a class. A class is a group that alleges it has been or is being adversely affected by an agency personnel management policy or practice that discriminates against the group. Findings are based upon adverse impact. When discrimination is found, an agency must eliminate or modify the employment policy or practice out of which the complaint arose.

Affirmative Employment Planning. EEO data are required for program analysis, which is the first step in affirmative employment program planning. The analysis should include the identification of any adverse impact resulting from policies or practices affecting hiring, employee development, promotions, and separations.

AFFIRMATIVE EMPLOYMENT DATA ANALYSIS

Steps in Affirmative Employment Data Analysis. The steps in affirmative employment data analysis are:

• Describe the "As-Is" and "Desired" Conditions.

• Measure the difference.

• Identify underrepresentation or adverse impact.

Describing "As-Is" or Actual Conditions. The "as-is" condition is described by current profiles of the work force and by profiles of recent selections (for hires, training, awards, etc.) that reflect an organization's personnel management policies, practices and decisions. Analysis of two to five years of data reveals trends in selections more accurately. EEO data that describe as-is conditions are the primary tool for identifying underrepresentation and adverse impact. The representation of minorities and women in the biological and life sciences occupation is an as-is condition. The distribution of cash awards is an as-is condition.

Describing "Desired" Conditions. Desired conditions are those that represent the organization's EEO policies and objectives. As examples: having a civilian work force that reflects the demographics of the workers in same occupations in relevant applicant

pool is a desired condition; a desired condition is for the recipients of training to reflect the demographics of the employees who are eligible.

Measuring the Difference Between "Desired" and "As-Is". The two methods for measuring the difference between desired and as-is conditions are the 4/5ths (80%) rule from the UGESP and the standard deviation test described in Hazeiwood V. United States and amplified in Partida v. Castaneda. Both methods recognize that there will naturally be some acceptable variation between the actual or "as-is" condition, and both suggest when affirmative action is appropriate.

The 4/5ths (80%) Rule. This "rule of thumb" is based in a comparison of selection rates. It recognizes that there will naturally be some variation between the actual or "as-is" selection rate and the expected or "desired" selection rate. The rule says that when the selection rate for an EEO group is less than 80% of the most favorable selection rate, the policy, procedure or practice that produced this result needs to be changed. The rule is applied in this manner:

Q: Is there adverse impact in selections for cash awards?

Determine the selection rate for each EEO group. (For this example, the selection rates for only two groups are shown.)

35 out of 500 White women employees were selected for cash awards.

35 selected/out of 500= 0.07,   0.07 x 100%= 7% selection rate

The selection rate for White women is 7%.

100 out of 1000 White men employees were selected for cash awards.

100 selected/out of 1000= 0.10,   0.10 x 100%= 10% selection rate

The selection rate for White men is 10%.

Compute 80% of the higher selection rate.

Selection rate for White men 10%

Multiplied by 0.80 (80%)   X .80

Equals 10% x .80 =8.00%

Compare the selection rates.

The selection rate for White women is less than 80% of the selection rate for White men (7% is less than 8%)

A: Yes, adverse impact is presumed. Corrective action is required.

The Standard Deviation Test. Standard deviation is a more precise measure of the difference between the actual and the expected. In simple terms, if the "as-is" or actual is

more than two standard deviations different from the "desired" or expected, there is a 95 percent probability that the 'as-is" condition happened for a reason and not by chance. The probability increases to 98 percent at three standard deviations. Affirmative action should be considered if representation of an EEO group is more than two standard deviations below the expected rate for an occupation or if the selection rate of an EEO group is more than two standard deviations below the expected rate. The test is applied in this manner:

Q: Are any EEO groups underrepresented in civil engineer, series 0810, positions? (In this example, we will examine only one group.)

There are 643 civil engineers in the division and 6 of them are Black men. From our civilian labor force data, we know that the expected percentage representation of Black men in civil engineer jobs is 2.7 percent.

Calculate expected number of Black men civil engineers.

To calculate the expected or number, multiply the total number of civil engineers by the CLF for Black men civil engineers:

Total in series 0810   643

Multiplied by the CLF percentage   .027

Equals 643 x 0.027=17.361 or 17

We would expect to have 17 Black men in civil engineer positions.

A: Yes. Black men are underrepresented in civil engineer positions. The actual number (6) is less than the expected number (17).

Q: Should affirmative action be considered?

Calculate the standard deviation for Black men civil engineers.

A commonly used formula for Standard Deviation (SD) is:

SD = Square Root of (Total number X EP (1 — EP))

where SD is "standard deviation" and EP is expected percentage

Using the information above on civil engineers in the division, the formula for standard deviation becomes:

SD   = Square Root of (643   X   0.027 (1   - 0 .027))

SD   = Square Root of (643   X   0.027 (0.973))

SD   = Square Root of (643   X   .02627)

SD   = Square Root of (16.89)

SD   =   4.11

The standard deviation for Black men civil engineers is 4.11

Q: Is the representation of Black men more than two standard deviations below the expected number?

Expected number of Black men civil engineers   17.00

Subtract 2 standard deviations (2 X 4.11)   — 8.22

17.00-8.22 = 8.78   or   9

The actual number of Black men (6) is less than 9.

A: Yes. Black men civil engineers are underrepresented by more than two standard deviations.

Clarifying "Expected Number" and "Desired Condition". "Expected number is a statistic used as a benchmark for defining the desired condition. "Desired condition" encompasses a range within which no significant underrepresentation or adverse impact is indicated and no corrective action is required.

Benchmarks for Data Analysis. When using the 4/5ths rule or the standard deviation test, it is important to use the correct benchmarks to define "desired" or "expected". Some benchmarks are absolute; others require the application of common sense. This list of categories of data and associated benchmarks is not all-inclusive, but will help guide affirmative employment data analysis to valid interpretations.

Data to be Analyzed	Benchmark
Work force (Analyze by occupation)	Appropriate civilian labor force (matched to the recruiting area)
Hires	Appropriate civilian labor force
Losses	Workforce. Especially look at losses of employees who are not eligible to retire.
Training	Work force (eligible employees)
Awards	Work force (eligible employees).
Performance ratings (high and low)	Work force
Promotions	Work force (eligible employees)
Temporary promotions	Work force (eligible employees)
Downgrades	Work force
Discipline	Work force
Supervisors	Work force (employees at same level or pay range)
"Co-op" Employees	Current college enrollments by major
Conversions of "co-ops"	"Co-ops" eligible for conversion

Interns, intern hires	Recent college graduates by major
Conversions of temp to perm	Temps eligible for conversion
Conversion of seasonal to 12-month	Seasonals eligible for conversion

Drilling Into the Data. The data analyst should look at the data carefully to ensure that serious imbalances are not hidden behind benign appearances. Just as a breakdown on the composition of the work force as a whole can mask underrepresentation in certain occupations, a breakdown on awards as a whole can mask underrepresentation in selections for certain kinds of awards (perfomiance awards, cash awards, cash awards over three percent of salary, etc.). Similarly, a breakdown on training as a whole can mask underrepresentation in selections for certain kinds of training (supervisory training, long-term training, etc.). For the same reasons, data analysis should drill into work force and selection data such as on conversions of "co-op", seasonal, and temporary employees to a more regular or permanent status.

AFFIRMATIVE EMPLOYMENT BARRIER ANALYSIS AND ACTION PLANNING

Steps in affirmative employment baffler analysis. The steps in affirmative employment barrier analysis are:

> • Identify and prioritize the problems and objectives

> • Identify barriers that cause or contribute to each problem

> • Develop action items with responsibilities and target dates

Problem. A "problem" is a situation or condition or condition that needs to be corrected or changed. In affirmative employment analysis, a problem is an "as-is" situation that violates the 415 Rule or fails the Standard Deviation Test.

Objective. An objective is something to be achieved, the purpose of an action. In affirmative employment action planning, an objective addresses the stated problem and focuses on the barrier(s). It is not necessary to state repeatedly that attaining a representative work force or eliminating underrepresentation is an objective: those are overall objectives of the plan.

Barrier. A barrier is an obstacle to meeting an objective. In affirmative employment action planning, a "barrier" is a management or personnel policy, procedure or practice that causes or contributes to the problem. Three types of bafflers are generally recognized:

Structural Barriers. Structural barriers are related to restrictions, rules, requirements, routines, traditions and habits — either externally or internally imposed — that affect the ability to attract, recruit, hire, develop, advance and retain a representatively diverse work force. Examples might include:

> • External policies — such as veterans' preference, restrictive qualification standards.

• Application procedures — such as accepting applications only on a certain form or only over the internet.

• Candidate evaluation criteria — such as a requirement for detailed knowledge of internal policies that screen out outside applicants.

• Working conditions — such as "family-unfriendly" policies that tend to adversely effect women more than men.

• Accessibility practices — such as allowing offices, restrooms, programs, and recreation facilities to be inaccessible to individuals with disabilities.

• Recognition and award practices — such as public ceremonies for only certain groups or top awards reserved for people in certain occupations.

Personnel Availability Barriers. Personnel availability barriers are related to an inadequate supply of minorities and women as applicants for employment, candidates on referral lists, nominees for long-term training, nominees for prestigious awards, etc. Examples might include:

• Recruitment practices — such as recruiting only at engineering conferences and not at science conferences.

• Temporary promotion policies — such as not opening consideration to all interested employees.

• Developmental assignment practices — such as not using temporary vacancies as developmental opportunities.

• Training practices — in which men can attend certain courses wherever they are available and women can only take them when they are available locally.

• Awards practices — such as requiring employees to write the nominations for their own honorary awards.

• Community relations practices — that do not project an image as an equal opportunity employer.

Attitudinal Barriers. Attitudinal barriers are related to personal or corporate attitudes, beliefs and values.

• Performance evaluation practices — such as a lack of consequences for discrimination or other violations of EEO policies.

• Awards practices — such as lack of recognition of achievement of managers and supervisors in EEO and affirmative employment.

• Workplace practices — such as allowing pictures and jokes of a sexual nature.

Action Item. An action item is a three-part description of an action that will be taken to change or discontinue a policy, practice or procedure that is a barrier.

The action. The action should be described in such a way that it can be observed and measured; actions such as "consider", "try", and "endeavor to" usually cannot be

observed or measured. The action should directly bear on the identified problem or objective; judging a high school science fair does not usually bear directly on recruiting Hispanic chemists. An action item should comply with the law (review especially "strict scrutiny", "compelling interest", and "narrow tailoring" in Adarand Constructors v. Pena, as cited in the references.). An action item should not give preference and should avoid terms such as "hire", "select", and "increase the number or — except in reference to increasing the number of applicants. Race- and gender-conscious recruitment of applicants from underrepresented groups is not prohibited or unfair.

The responsible official. An action item should identify the official who is responsible for ensuring that the action is taken. "All supervisors" is not usually an appropriate identification of that official.

The target date. A target date for completion should be identified for each action. "Continuous", "as needed", and "as appropriate" are not target dates.

The Planning Document. The EEOC's model affirmative employment planning form (page 10 of EEOC Form 566) combines the problem and barrier statements. However, it is often useful to separate the two. Consider the format provided at Appendix II.

The Action Planning Team. The development of the affirmative employment program plan should be a team effort. Key members of the team include:

Commander -- Sets the tone with personal policies and expectations, and appoints or approves team members.

Career Program Managers (CPMs) and Other Managers — Experts on how the organization does its business; they are experts on barriers in recruitment, including the SKAP and ACCES processes, the qualifications of employees in the "pool" or "pipeline", candidate evaluation, work assignments, performance expectations, training needs, career paths and progression, use of temporary and seasonal employees, use of interns and "co-ops", recognition and motivation, and future needs.

Civilian Personnel Advisory Center (CPAC) Representative — Advises on flexibilities and available alternatives in civilian personnel administration.

Counsel -- Advises on legal sufficiency.

Union Representative — Consults on changes in working conditions, etc.

EEO Officer — Performs data analysis, identifies problems, leads the action planning effort, and publishes the affirmative employment program plan.

Others — Appointed for their special knowledge, insight or abilities, including facilitation skills.

Obstacles to Barrier Analysis and Action Planning. Barrier analysis and action planning are hard and unpleasant. Barrier analysis requires candid self-evaluation of the organization's tried-and-true ways of going about its business. When the data reveal unpleasant truths, some may challenge the data or advocate more study rather than more action. Barrier analysis requires a written admission of imperfection. Action planning raises expectations among employees. It requires people to do things, and it requires people to do things differently, and it requires a degree of accountability.

Action Planning Suggestions. Problems identified through the data analysis should be screened for those that are within, the organization's authority to correct and prioritized for those that present the greatest opportunities for improvement. If ideas are not flowing during the barrier analysis team's discussions, it may be helpful to reword the objective in a... "will".. statement or to divide it into sub-objectives. Reference to the list of barriers and possible solutions at Appendix I may also help. For barriers that are particularly resistant to change, it may be useful to divide the corrective action into short and long range action items with target dates for each.

Value Added by Barrier Analysis and Action Planning. EEO data analysis identifies underrepresentation in the work force and adverse impact in selections. The value added by barrier analysis and action planning includes identifying detrimental policies, practices and procedures; developing alternative policies, practices and procedures; reducing vulnerability to class claims of discrimination; improving accountability for corrective action; and enhancing employee confidence in management fairness and equity.

Post -Adarand Action Planning. The affirmative employment action plan should be coordinated with the Office of Counsel if a representative is not a part of the planning team to ensure compliance with the guiding principles from Adarand and other decisions and guidance.

Remedy. Action items should have the purpose of remedying the effects of discrimination or the effects of practices that unintentionally extend the effects of past discrimination. They should be aimed at on-going patterns and practices or the lingering effects of prior practices.

Narrow Tailoring. Action items should be "narrowly tailored" to the particular group that is effected. If only White women are underrepresented in the economist occupation, it is not appropriate to seek to increase the representation of other EEO groups in that occupation. Similarly, if Hispanic men are underrepresented in only the civil engineering occupation, it is not appropriate to seek to increase their representation in all engineering occupations or in the entire "professional" category of occupations.

Race-Neutral Alternatives. Before establishing any action that uses race or ethnicity as a basis for decisionmaking, race-neutral actions should be tried and tested. Recruitment, outreach, and other efforts to increase minority applications for employment are perhaps the best example. Other race neutral methods would include training programs that are open to all employees, eliminating unnecessary selection criteria that have a disproportionate impact on minorities, defining selection criteria so as to give credit for overcoming social or economic disadvantage, and correcting other policies and practices which have had a disproportionate impact.

EXAMPLES OF BARRIERS AND SOLUTIONS

Recruitment Problems: Some EEO groups are underrepresented among candidates referred for positions.

Recruitment Barriers:

- ❖ Lack of equal opportunity recruitment plan.
- ❖ Lack of outreach with schools, organizations and associations having pools of minorities and women.
- ❖ Lack of targeted advertising.
- ❖ Recruitment focused on the "usual" sources.
- ❖ Limited staff and funding for recruitment.
- ❖ Restrictions imposed by higher headquarters or the Office of Personnel Management: freezes,
- ❖ veteran's preference, limits on intern positions, out-of-date qualification standards. Limited use of intern, "co-op", and other special programs.
- ❖ Competition from other employers, both private and public.
- ❖ Poor or lacking public image.

Recruitment Solutions:

- ❖ Coordinate corporate and local recruitment.
- ❖ Encourage and reward referrals by current employees.
- ❖ Seek or create opportunities to tell the Corps story to groups of potential applicants.
- ❖ Conduct targeted advertising.
- ❖ Conduct targeted recruitment for specific jobs.   -
- ❖ Establish permanent part-time and job-sharing positions.
- ❖ Engineer jobs to recruit at other than the full performance level.
- ❖ Recruit current employees; counsel and coach on career advancement, functional and
- ❖ geographic diversity, career program registration.
- ❖ Request and use special staffing and hiring authorities.
- ❖ Identify underutilized employees who have skills and aspirations outside their current career fields.
- ❖ Publish vacancy announcements simultaneously with requesting career referral lists.
- ❖ Expand the area of consideration.
- ❖ Use upward mobility, apprenticeship, and intern programs, on-the-job training, and details to
- ❖ develop internal candidates for mid- and upper-level positions.

Selection Problems: Some EEO groups are referred but are underrepresented in selections for hires and promotions.

Selection Barriers:

- ❖ Lack of clearly defined selection procedures.
- ❖ Unquestioned and unresolved inconsistencies in panel members' ratings.
- ❖ Panel members are not well versed in the candidate evaluation process.
- ❖ Lack of awareness and/or support of affirmative employment objectives.
- ❖ Priority placements.

Selection Solutions:

- ❖ Develop, coordinate, publicize and implement selection procedures.
- ❖ Educate selecting officials and panels on the candidate evaluation process and affirmative
- ❖ employment objectives.
- ❖ Allow substitution of education for experience; allow substitution of experience for education.
- ❖ Identify and credit job-related knowledge, skills and abilities gained through any valid means.
- ❖ Identify and eliminate requirements for specialized knowledges that can be gained during an orientation period.
- ❖ Test selection criteria against current successful employees. Identify and eliminate requirements that do not predict successful performance.

Promotion Problems: Some EEO groups are underrepresented in selections for promotion.

Promotion Barriers:

- ❖ Employees are not developing the knowledges, skills, abilities, experiences and accomplishments necessary to successfully compete.
- ❖ Selection of training courses is left to the employee or is not planned to address needed knowledges and abilities.
- ❖ Preferred, visible and choice work assignments are not rotated among eligible and interested employees.
- ❖ Preferred, visible and choice work assignments are made on the basis of whom the customer prefers.
- ❖ Preferred, visible and choice work assignments are made on the basis of assumptions about willingness to travel or work overtime.
- ❖ Information on how to apply or be nominated for competitive development opportunities, awards, and advancement is difficult to find.
- ❖ New employees receive little or no orientation to the organization, its mission, processes, and culture.

❖ There is little information, counseling or coaching on the knowledges, abilities, and experiences required, expected or desirable for advancement.

❖ Training courses are selected based on assumptions about family responsibilities and willingness to travel.

❖ See also selection barriers.

Promotion Solutions:

❖ Prepare and implement a new-employee orientation that includes introductions to internal and external contacts and customers.

❖ Provide information to unsuccessful candidates who are employees and to their supervisors on reasons for non-selection with suggestions on how to improve qualifications.

❖ Develop and use a policy for recommending training and offering developmental opportunities.

❖ Provide counseling on preparing written applications for competitive training, awards, and employment opportunities.

❖ See also selection solutions.

Training and Development Problems: Some EEO groups are underrepresented in selections for training, for long-term training, for required courses, etc.

Training and Development Barriers:

❖ Absence of or inadequate career development counseling.

❖ Lack of individual development planning.

❖ Lack of involvement of career program manager and supervisor in the development of training plans.

❖ Lack of upward mobility planning and positions.

❖ Lack of opportunities for developmental assignments when positions are vacant.

❖ See also Promotion Barriers.

Training and Development Solutions:

❖ Select training courses based upon advice of the CPM, supervisor, and HR advice in addition to employee preferences.

❖ Use details and rotational assignments when positions are vacant or to meet temporary needs.

❖ Conduct workshops for employees on career development.

❖ See also promotion solutions.

Performance Evaluation Problems: Some EEO groups are underrepresented in top-block performance ratings. Some EEO groups receive a disproportionate share of ratings below "fully successful".

Performance Evaluation Barriers:

❖ Inconsistent performance standards among positions with the same or very similar duties.

❖ Subjective evaluations due to vague or general standards.

❖ Unclear expectations of supervisors.

❖ Different expectations for women or minorities.

❖ Reluctance to be forthright with members of some minority groups about performance problems.

❖ Courses and assignments that would correct performance shortcomings not included in training plans.

Performance Evaluation Solutions:

❖ Develop consistent, objective criteria for performance assessment.

❖ Get help from employees and human resources advisors in rewriting ambiguous or unclear standards.

❖ Enforce mid-year counseling on how performance is viewed; clarify expectations, fine-tune standards if necessary.

Discipline Problems: Some EEO groups are disciplined at higher than representative rates; severity of discipline is inconsistent for similar offences.

Discipline Barriers:

❖ Unclear expectations of supervisors.

❖ Assumptions about how one should or "has to" deal with women or members of particular minority groups.

❖ Failure to act — without formal discipline — on the first indication of a problem. Reluctance to be forthright with members of some minority groups and/or women about their

❖ performance or conduct.

❖ Concluding that discipline is appropriate or deserved before all pertinent facts are known.

❖ Assumptions about the values and/or ethics of some minority groups.

Discipline Solutions:

- ❖ Clearly communicate expectations on performance and conduct.

- ❖ Provide periodic performance counseling with each employee. Discuss their work products

- ❖ that are examples of excellence, needing improvement, or failure to meet expectations. Sponsor workshops for supervisors on management styles, procedures for disciplinary actions, and cultural diversity.

- ❖ Examine and adjust any expectations that are based on race or sex.

Awards Problems: Some EEO groups are underrepresented in selections for awards.

Awards Barriers:

- ❖ High visibility and career enhancing work assignments repeatedly go to the same people.

- ❖ Supervisors expect employees to nominate themselves without encouragement.

- ❖ Employees must prepare the nominations in spare time, with little guidance or assistance.

- ❖ Endorsements are short, general, and are not tailored to the employee, the accomplishment, or the award criteria.

Awards Solutions:

- ❖ Nominate employees or encourage employees to prepare nominations for appropriate awards.

- ❖ Arrange group or individual counseling/training on the criteria and requirements for career- enhancing awards.

- ❖ Arrange group or individual counseling/training on preparing successful nominations for competitive awards.

- ❖ Enlist the assistance of the career program manager, public affairs, and human resources in polishing and fine-tuning the final nomination package, including endorsements, for content and appearance.

- ❖ Adjust work assignments where employees have not had opportunities to excel at career enhancing work assignments and responsibilities.

AFFIRMATIVE EMPLOYMENT PROGRAM FOR MINORITIES AND WOMEN
REPORT OF OBJECTIVES AND ACTION ITEMS

PROGRAM ELEMENT: Work Force, Recruitment and Hiring

PROBLEM: Women of all races are underrepresented by two or more standard deviations in the biological and life sciences occupation, with the underrepresentation more severe above grade GS-12.

OBJECTIVE: The number of women who are referred for biological and life scientist positions will reflect their availability in the relevant labor pool (approximately 42%).

BARRIERS: Targeted recruitment focuses primarily on filling engineering and physical science positions. Intern and "co-op" positions are not used to hire and develop biological and life scientists. There is no outreach to organizations and associations having pools of women biological and life scientists.

ACTION ITEMS:	RESPONSIBLE OFFICIALS:	TARGET DATE:
Include recruitment of biological and life scientists to the Equal Opportunity Recruitment Plan; specify the use of advertising, public relations, and outreach.	Cheif, CPAC	30 Nov 01
Establish and fill one locally funded intern position in the biological and life sciences occupation.	Chief, Plans, Programs, & Project Mgmt.	15 Jun 02
Establish and fill two "co-op" positions in the biological and sciences occupation.	Chief, Const Operations	15 Jan 02 15 Sep 02
Conduct a career advancement workshop for employees in the biological and life sciences occupation.	Career Program Manager, CP-18	1 Feb 02